

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Timothy Ray Chitwood

Case No. Case: 2:25-mj-30113
Assigned To : Unassigned
Assign. Date : 3/4/2025
Description: CMP USA V. SEALED
(DJ)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 6-1-2024 to 7-16-2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2252A(a)(5)(B)	Possession of child pornography
18 U.S.C. § 2252A(a)(2)	Distribution and receipt of child pornography

This criminal complaint is based on these facts:
see attached affidavit.

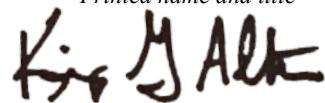
Continued on the attached sheet.



Complainant's signature

Eli Bowers, Special Agent (FBI)

Printed name and title



Judge's signature

Hon. Kimberly G. Altman, United States Magistrate Judge

Printed name and title

Date: March 4, 2025

City and state: Detroit, Michigan

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR
A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Eli Bowers, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since 2015 and am currently assigned to the FBI Detroit Division. Prior to being employed by the FBI, I was employed as a Park Ranger with the National Park Service for approximately six years, where my duties included the enforcement and investigation of federal crimes. While employed by the FBI, I have investigated numerous federal criminal violations related to child exploitation and child pornography. I have received training in investigating internet fraud, computer intrusions, and matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting these types of investigations.

2. I have received training in the area of child pornography and child exploitation and, as part of my duties, I have observed and reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media. Moreover, I am a federal law enforcement

officer who is engaged in enforcing criminal laws, including 18 U.S.C. § 2252A. I am authorized by law to request an arrest warrant.

3. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for Timothy Ray CHITWOOD for violations of 18 U.S.C. § 2252A(a)(5)(B), possession of child pornography, and 18 U.S.C. § 2252A(a)(2), distribution and receipt of child pornography.

4. The statements contained in this affidavit are based in part on information provided by U.S. law enforcement officers, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from investigative sources of information, and my experience, training, and background as a Special Agent.

5. This affidavit is submitted for the limited purpose of securing a complaint and an arrest warrant. I have not included every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that CHITWOOD has committed the offenses listed above.

PROBABLE CAUSE

6. On July 16, 2024, a family member of Timothy CHITWOOD turned over CHITWOOD's cell phone to local police in Allen Park, Michigan. The family member reported that they found child pornography on the phone and showed law

enforcement multiple videos of pornography involving children from the phone. Detectives from the Allen Park police department acquired and executed a search warrant on the phone. Law enforcement executed an additional warrant to search CHITWOOD's residence and seized additional electronic devices. The family member initially took CHITWOOD's phone from his residence, which is located in the Eastern District of Michigan.

7. During the execution of the search warrant at CHITWOOD's residence, Detectives advised CHITWOOD of his Miranda rights and he waived them. When Detectives asked CHITWOOD how old he believed the girls depicted in the pornography videos on his phone were, CHITWOOD told the Detectives, "I don't know maybe 16 or 17." When Detectives asked CHITWOOD if he had any pornography of girls under the age of 15, CHITWOOD stated not that he could remember.

8. Law enforcement reviewed CHITWOOD's cell phone and observed child pornography. For example, a text message conversation was observed between CHITWOOD and another individual, where they exchanged child pornography. The following are some excerpts from the chat between CHITWOOD, and the unknown individual (Unk-1) from June 26, 2024:

CHITWOOD: I'm into taboo fam

Unk-1: Mmm omg yes me too

CHITWOOD: Yngr too

Unk-1: Love younger so much too

CHITWOOD: Mmm hot

CHITWOOD: Pics? Vids?

Unk-1: Of yng

Unk-1: Yeah I have. Hbu

CHITWOOD: Yes

Unk-1: What ages you have

CHITWOOD: Yng u?

Unk-1: Same

CHITWOOD: Y first plz

Unk-1: Why you won't send it first

Unk-1: Kinda nervous

CHITWOOD: Wanna use Snapchat instead?

Unk-1: Sorry don't have

CHITWOOD: Oh well we can here

CHITWOOD: I'll send right after u ok?

Unk-1: Okay

Unk-1: (Sends an image of an approximately 7 year-old girl, nude, exposing her bare chest and vagina)

CHITWOOD: (Sends 28 second video of an approximately 11-year-old girl exposing her vagina and anus while masturbating)

CHITWOOD: (Sends a 23 second video of an adult man having vaginal sex with a prepubescent girl).

9. The image sent by Unk-1 and the videos sent by CHITWOOD met the federal definition of child pornography. The entire text conversation occurred over the course of approximately 2 hours and contained more than 20 additional child pornography images and videos exchanged between CHITWOOD and Unk-1.

10. Law enforcement reviewed another chat on CHITWOOD's phone, this one using Telegram. Telegram is an Internet-enabled chat application which allows for users to exchange text messages, images, and videos. The following are some excerpts from the chat between CHITWOOD, and the unknown individual on Telegram (Unk-2) from June 1, 2024.

CHITWOOD: (Sends a nine second video of an approximately 12-year-old girl masturbating while exposing her bare chest and vagina)

CHITWOOD: Mmm hottt

CHITWOOD: I love older, fucking younger, That's so hot now I like younger fucking older

Unk-2: Both are hot

Unk-2: Would love to watch you Jack off to it

CHITWOOD: Same I would love to suck you while you watch them and then you suck me that would be so hot, Are you into young girls too or just young boys?

CHITWOOD: I seen this one video. I can't find it anymore, This young, probably 30 something old blac dude was fucking like a 12-year-old boy he had him sitting on his dick and the boy was moaning and he was telling him just let me hurry up and do it is so fucking hot, Do you have any like that like black guy, a white boy?

Unk-2: Not really in to girls but honestly if it involves a guy getting his rocks off no matter boy or a girl it probably will make me hard lol

Unk-2: I do but it's hard to find them and send maybe we meet up we can watch it together,

Unk-2: I don't know if I have that exact one though

CHITWOOD: Do you have any more like older and younger, especially chubby?

Unk-2: (Sends one minute 53 second video of an adult male having anal sex with an approximately 8-year-old boy)

Unk-2: (Sends eight additional videos of children aged between approximately 6 and 10 years-old, engaged in sexual acts with adults.)

11. The videos sent by Unk-2 and the videos sent by CHITWOOD on the Telegram application, met the federal definition of child pornography. The entire text conversation occurred over the course of approximately 40 minutes and contained approximately 20 child pornography videos exchanged between CHITWOOD and Unk-2.

12. During the forensic analysis of CHITWOOD's cellular phone, a total of approximately 80 videos which met the federal definition of child pornography were observed on the device.

13. I believe this phone was used by CHITWOOD because CHITWOOD identified the phone as his when law enforcement showed the phone to him during the execution of the search warrant at his residence. Also, CHITWOOD previously reported to local police that his cell phone had been stolen by the same family member who turned it over to police.

14. The phone contained user information for the LinkedIn, Facebook, and Apple ID accounts associated with the name "Tim Chitwood." The phone was also linked to an electronic payment system, specifically Apple Wallet, to a credit card with the name "Timothy Chitwood."

CONCLUSION

15. Based on the foregoing, there is probable cause to believe that Timothy Ray CHITWOOD violated 18 U.S.C. § 2252A(a)(5)(B), possession of child pornography, and 18 U.S.C. § 2252A(a)(2), distribution and receipt of child pornography.

Respectfully submitted,



Eli Bowers, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Honorable Kimberly G. Altman
United States Magistrate Judge

Date: March 4, 2025